

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KH-REIT II FUNDING XXII, LLC,
Plaintiff,

v.

GRANT MEADOWS, L.L.C. and
SHAHIN JAMEA,
Defendants.

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Case No. 4:22-CV-3730

**PLAINTIFF'S UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO
FILE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE KEITH P. ELLISON:

Plaintiff KH-REIT II Funding XXII, LLC (“Knighthead”) files this unopposed motion for extension of time to file its reply in support of its pending motion for summary judgment.

On February 6, 2024, Plaintiff filed a motion for summary judgment. (Doc. 37). Defendants filed their response on February 27, 2024. (Doc. 46). Plaintiff’s reply is currently due on March 15, 2024.

Plaintiff respectfully requests a 1 week extension of the deadline for filing a reply. The new deadline would be March 22, 2024.

There is good cause for this extension. Mr. Guillermo Alarcon has been the attorney primarily responsible for drafting Plaintiff’s reply. Mr. Alarcon’s son was born on March 11, 2024, and tending to the newborn and his wife has prevented Mr. Alarcon from completing the reply.

Plaintiff's counsel has conferred with Defendants' counsel, and this motion is unopposed.

CONCLUSION AND PRAYER

For these reasons, Plaintiff respectfully requests that the deadline for filing its reply be extended to March 22, 2024.

Respectfully submitted,

/s/ Matthew Baumgartner

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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that on March 14, 2024, I conferred with Mr. Weston Ray, counsel for Defendants, regarding this motion for extension of time. Mr. Ray indicated to me that this motion was unopposed.

/s/ Guillermo A. Alarcón

Guillermo A. Alarcón

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2024, a true and correct copy of the foregoing was served on all counsel of record.

/s/ Guillermo A. Alarcón

Guillermo A. Alarcón